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Andrew M. J. Bernstein
Lance A. Clarke
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August 27, 2018

BY ECF

Honorable James Orenstein
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Pettiford v. City of New York et al.*, No. 17-cv-5273 (ILG) (JO)

Your Honor,

I write as Plaintiff's counsel to request an extension of time to file an application for costs and fees related to the accepted Rule 68 offer of judgment. On August 15, 2018, the Court entered Judgment in favor of the Plaintiff. Fed. R. Civ. P. 54(d)(2)(B) requires that a motion for fees be made "no later than 14 days after the entry of judgment," "[u]nless a statute or a court order provides otherwise." Plaintiff has made good-faith efforts to resolve the issue of costs and fees without the need for court intervention. On August 9, 2018, I sent Defendants' counsel a detailed accounting of Plaintiff's costs and fees, including contemporaneous time records of the work undertaken by Plaintiff's counsel. On August 16, Defendants' counsel responded that he needed additional time to review Plaintiffs' fees, and on August 17, Defendants' counsel indicated that he hoped to respond this week. Accordingly, Plaintiff requests a two-week extension, until September 12, to file a motion for fees if necessary. Defendants' counsel has indicated his consent to this request. This is Plaintiff's first request for an extension of this deadline.

I appreciate the Court's attention to this request.

Respectfully,

A handwritten signature in blue ink, appearing to read 'J. Moskowitz', with a stylized flourish at the end.

Joshua S. Moskowitz

cc: Evan Brustein (by ECF)